

AFFIDAVIT

MAHMOUD AMIN MOHAMED ELHASSAN, having been first duly sworn, upon

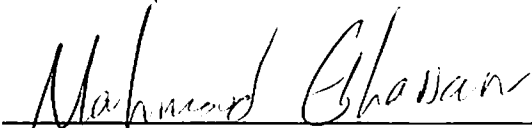
oath, hereby state as follows:

1. I am the Defendant in these proceedings and have read the foregoing pleading prepared by my attorneys and entitled: Defendant's Motion to Withdraw His Plea of Not Guilty to Counts 2 & 3. ✓
2. I have thoroughly discussed my case with my attorneys and have reviewed the discovery materials provided by the government to my attorneys. I have also thoroughly discussed my trial rights and options with my attorneys and this decision to plead guilty to Counts 2 & 3. I am fully satisfied with the representation my private attorneys have provided me and am making this decision to plead guilty freely and voluntarily.
3. In desiring to plead guilty to Count 2, I admit that from on or about August 1, 2015, and continuing through on or about January 15, 2016, in Prince William County in the Eastern District of Virginia, I did knowingly and unlawfully attempt to provide "material support and resources," as that term is defined in Title 18 United States Code, Section 2339A(b), to wit, personnel—by aiding and abetting Joseph Hassan Farrokh's attempt to provide himself to the Designated Foreign Terrorist Organization, the Islamic State of Iraq and the Levant ("ISIL"). More specifically, I admit that, among other things, during this time period I introduced Mr. Farrokh in or about August 2015 to an individual I believed could facilitate his travel to the Islamic State; and, that on January 15, 2016, I drove Mr. Farrokh in my taxicab from his home in Richmond, Virginia, to a location near the Richmond airport so that Farrokh could embark on his travel to the Islamic State. I also admit that later

that same day after Mr. Farrokh left my taxicab to go to the Richmond airport, I made false statements to the FBI when questioned about Farrokh's travel; and that I made these statements to the FBI in order to hinder the government's investigation of Farrokh's travel. The substance of these false statements are more fully set forth in Count 3 of the indictment.

4. In desiring to plead guilty to Count 3, I also admit that on January 15, 2016, I knowingly, unlawfully, and willfully made material false, fictitious, and fraudulent statements and representations in a matter involving international terrorism within the jurisdiction of the executive branch of the Government of the United States. Specifically, I admit that in an interview with Special Agents of the Federal Bureau of Investigation on January 15, 2016, I falsely stated to them that (a) Joseph Hassan Farrokh had flown out of Dulles Airport earlier that day on a flight to California to attend a funeral; (b) Farrokh had said that he would be back in about two weeks; (c) neither I nor Farrokh supported the Islamic State; and, (d) neither I nor Farrokh ever tried to find someone to help Farrokh get to the Islamic State.
5. In making this request to change my plea to Counts 2 & 3, I expressly acknowledge and understand, and have been so counseled by my attorneys, that I am offering to plead guilty to Counts 2 & 3 without any promises, representations or agreements of any kind with the United States.

Sworn and subscribed before me
this _____ day of October, 2016.



MAHMOUD AMIN
MOHAMED ELHASSAN

NOTARY PUBLIC